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October 26, 202'1

VIA ECF

Honorable Andrew L. Carter, Jr. Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 Re:

<u>United States of America v. Gazmend Lita</u> Criminal Case No. 20-660(ALC)

Dear Judge Carter:

As part of the conditions of pretrial release in the above-captioned case, defendant Gazmend Lita's travel was limited to the Southern and Eastern Districts of New York and the District of New Jersey. We write the Court to request a temporary modification of Mr. Lita's bail conditions to permit him to travel to Montenegro from November 7, 2021 through November 12, 2021.

With the Court's permission, Mr. Lita hopes to travel to Montenegro for business. He specifically hopes to conduct a site visit to the company Alume D.O.O., which manufactures building products including windows, glass, and aluminum panels. Alume hopes to begin distributing its products in the United States and has asked Mr. Lita to spearhead this effort as a sales representative. The purpose of Mr. Lita's trip would be to familiarize himself with the company's products and operations. He specifically hopes to understand Alume's production timeline and to ensure that Alume's products are on par with the quality standards of similar products in the United States. If Mr. Lita's request is granted, he further requests that he be permitted to obtain his passport from Pretrial Services on or after November 4, 2021 in advance of his proposed travel. In accordance with the conditions of his release, Mr. Lita will provide Pretrial Services with any travel-related information it requests.

I have communicated Mr. Lita's request to the Government (AUSAs Samuel Raymond and David Felton) and Pretrial Services (Officer Francesca Tessier-Miller). The Government has consented to my request on two conditions: (1) that Mr. Lita shares all travel particulars (flights, accommodations, and itinerary) at least 48 hours in advance with Pretrial Services and the Government, and (2) solely for the duration of his travel abroad, Mr. Lita's wife and three children must surrender any travel documents that they may have while Mr. Lita is abroad, to be returned

## Case 1:20-cr-00660-ALC Document 169 Filed 11/02/21 Page 2 of 2

Honorable Andrew L. Carter, Jr., U.S.D.J.

**United States District Court** 

Re: <u>United States of America v. Gazmend Lita</u>

Criminal Case No. 20-660(ALC)

October 26, 2021

Page 2

upon his return to the United States. Pretrial Services does not take a position on this request. Thank you for your consideration.

Respectfully submitted,

WHIPPLE AZZARELLO, LLC

By: /s/ John A. Azzarello John. A. Azzarello

JAA:wm

cc: David Fenton, A.U.S.A. (Via Email)

Samuel Raymond, A.U.S.A. (Via Email)

Francesca Tessier-Miller, U.S. Pretrial Services Officer (Via Email)

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HONORABLE ANDREW L. CARTER

United States District Judge